

**State of Tennessee
Waiver Request
Workforce Investment Act**

Request for Waiver to Report the Common Measures

Statutory and Regulatory Provisions to be Waived

The Tennessee Department of Labor and Workforce Development requests a waiver under the authority of the Secretary of Labor to waive requirements of the Workforce Investment Act (WIA), Title 1, Subtitles B and E. Tennessee is requesting a waiver to reporting the 17 statutory measures required under WIA §136(b), and as required in 20 CFR §666.100(a) and §666.300(a), which specify the state and local performance measures currently required for WIA Title 1 programs. The Tennessee Department of Labor and Workforce Development will report performance using the federal Common Measures exclusively.

State or Local Statutory or Regulatory Barriers

There are no State or local statutory barriers to implementing the requested waiver. Nothing in this waiver is intended to prevent the State or local workforce board from implementing additional measures to assess performance.

Goals to be Achieved by the Waiver and Expected Programmatic Outcomes

This waiver will allow Tennessee to continue its performance focus, facilitate system integration across partner programs, and enhance the state's flexibility to plan and implement innovative and streamlined service delivery strategies, as well as strengthen our continuing work to provide strategic economic and labor market investments. The Common Measures provide a simplified and streamlined performance measurement system, consistent with the new WISPR (Workforce Investment Streamlined Performance Reporting) system. Tennessee's Cyclical Performance Management System, as further explained in our recently approved WIA Strategic Five-Year Plan, is an excellent match with WISPR and the Common Measures, and already has produced a first draft WISPR file. A waiver to report Common Measures exclusively thus will provide cost effectiveness, better case management, and increased customer service.

This waiver is viewed as a continuous improvement measure which will have the following benefits and outcomes:

- Facilitate the goal of a fully integrated workforce system,
- Provide clear and understandable information to stakeholders concerning the use of public funds and return on investment,
- Improved case management integration, service coordination and information sharing,
- Assist in the realignment of youth program designs to better implement ETA's New Youth Vision and targeting out-of-school youth,
- Use a single set of measures for youth, thus eliminating the need to track younger versus older youth, and
- Reduce labor intensive data collection and processing.

Description of the Individuals Impacted by the Waiver

All customers of the workforce system will benefit from this waiver. The quality and quantity of services to participants will be enhanced by focusing on fewer targeted outcomes. State and local program administrators will benefit as the State progresses toward a fully integrated workforce system that concentrates on demand-driven accountability measures.

Description of the Process to Monitor Progress

The Division of Workforce Development (Division), Tennessee Department of Labor and Workforce Development will monitor the implementation and impact of the waiver, as well as progress toward meeting expected outcomes. This will be accomplished as follows:

- Tennessee's eCMATS (Enhanced Consolidated Management and Tracking System) online database will be used for case management, tracking of services, follow-up and reporting. eCMATS will be used to monitor the data collection and reporting of the Common Measures at both the state and local levels. eCMATS presently accommodates the new WISPR reporting system, and permits specialized reports to ensure accuracy of the data. This will enable state and local staff to identify technical assistance needs.
- The Division will review applicable policies, procedures, and manuals and modify them accordingly.
- The Division will report performance on the Common Measures to ETA quarterly and annually in accordance with the WIA Performance Reporting System.
- The Division will monitor the implementation of the waiver through quarterly reports and meetings with Local Workforce Investment Area (LWIA) administrators. The reports and meetings will serve as opportunities to address implementation issues.
- The State incentive and sanction policy will be revised around the Common Measures to reward success in exceeding performance and require timely corrective action to increase the performance of failed measures.

Opportunity for Local Board and Public Comment on Waiver Request

The proposed waiver would impact all 13 of Tennessee's LWIAs. Tennessee's State Workforce Development Board of Directors, representing the 13 LWIAs, has instructed the Division to submit this Request for Waiver to the Common Measures to the US Department of Labor for consideration. The draft waiver request will be posted on the Division's website for 30 days for public review and comment, and we will solicit additional public input regarding this waiver request through notification to our State and local partners.

Send any comments or questions regarding the waiver request to Susie.Bourque@state.tn.us or call 651-741-1031.